

UNITED STATES BANKRUPTCY COURT
DISTRICT OF VERMONT

In re:

ROMAN CATHOLIC DIOCESE OF
BURLINGTON VERMONT,

Case No. 24-10205
Chapter 11

Debtor.

**SUPPLMENT TO APPLICATION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS
TO RETAIN AND EMPLOY BERKELEY RESEARCH GROUP, LLC AS
FINANCIAL ADVISOR EFFECTIVE AS OF NOVEMBER 20, 2024**

The Official Committee of Unsecured Creditors (the “**Committee**”) of The Roman Catholic Diocese of Burlington, Vermont (the “**Debtor**”), the above-captioned debtor and debtor in possession hereby submits this supplement to its application (the “**Application**”) for entry of an order, pursuant to sections 327 and 1103(a) of Title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the District of Vermont (the “**Local Rules**”), authorizing and approving the employment of Berkeley Research Group, LLC, as financial advisor (“**BRG**” or the “**Firm**”) to the Committee in connection with the Debtor’s chapter 11 case, effective as of November 20, 2024.

In further support of the Application, the Committee offers the following time line for the Court’s consideration.

- The case was filed on September 30, 2024.
- On October 22, 2024, the United States Trustee appointed the Committee pursuant to section 1102 of the Bankruptcy Code.

- Following the Committee's appointment, on or about November 20, 2024, the Committee, subject to Court approval, retained BRG as its financial advisor.
- The Thanksgiving, Christmas, Jewish and New Years holidays then took place.
- The BRG application was filed on January 21, 2025.

The Committee respectfully suggests that the confluence of the Committee's decision to retain BRG coming just before the Thanksgiving holiday, which last year was very late in November, and the holiday season which quickly followed are sufficient to justify the timing of the filing of the Application on January 21, 2025. *In re Keren Limited Partnership*, 189 F3d 86 (2d Cir. 1999).

WHEREFORE, the Official Committee of Unsecured Creditors respectfully requests that the Court grant its Application to retain and employ Berkeley Research Group, LLC as financial advisor, effective as of November 20, 2024, and such other relief as this Court may deem just and proper.

Dated: February 3, 2025

Respectfully submitted,

/s/Paul A. Levine
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